

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. 580, 588, 607 & 619

CERTIFICATION OF COUNSEL

I, Matthew R. Pierce, counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On January 25, 2023, the Debtors filed under seal with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Motion of the Debtors for Entry of an Order Pursuant to Bankruptcy Rule 2004 and Local Rule 2004-1 Authorizing Discovery in Connection with Confidential Investigation* [D.I. 580] (the “Motion”).

2. On January 27, 2023, the Debtors filed the *Notice of Filing of Redacted Version of Debtors’ Motion for Entry of an Order Pursuant to Bankruptcy Rule 2004 and Local Rule 2004-1 Authorizing Discovery in Connection with Confidential Investigation* [D.I. 588], attaching a redacted public version of the Motion as Exhibit 1 thereto.

3. On February 2, 2023, the Office of the United States Trustee (the “U.S. Trustee”) filed the *Limited Objection of the United States Trustee to Rule 2004 Motions* [D.I. 607] (the “Limited Objection”).

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

4. On February 5, 2023, the Debtors filed the *Reply of the Debtors and the Official Committee of Unsecured Creditors in Support of Motions Authorizing Rule 2004 Examinations* [D.I. 619].

5. As of the date hereof, no other formal objections or other formal or informal responses to the Motion have been filed or served on the Debtors.

6. To resolve the Limited Objection, the Debtors have revised the proposed form of order (the “Revised Order”), a copy of which is attached hereto as **Exhibit A**. A copy of the Revised Order compared against the proposed form of order attached to the Motion is attached hereto as **Exhibit B**. The U.S. Trustee and the Official Committee of Unsecured Creditors have no objection to the entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

7. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: February 7, 2023
Wilmington, Delaware

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/s/ Matthew R. Pierce

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